

REMARKS

In the Office Action, claims 1-4, 6-8 and 29-44 were rejected. Reconsideration and allowance of all pending claims are requested.

Rejections Under 35 U.S.C. § 103

The Office Action summarizes claims 1-4, 6-8 and 29-44 as rejected under 35 U.S.C. §103(a) as being unpatentable over Schroeder et al. (U.S. Patent No. 4,095,205; hereinafter "Schroeder") in view of Fujita et al. (U.S. Patent No. 4,096,313; hereinafter "Fujita"). Rejected claims 1, 29, 33, 38 and 42 are independent and will be discussed in detail below.

Previous response to obviousness rejections

The Examiner indicated that Applicants made no argument regarding the 103 rejections in the previous response. Claims 5 and 36 were rejected in the previous Office Action. Applicants respectfully submit that by the previous response claim 5 was canceled. Further, claim 36 depends from independent claim 33 and was presumed to be allowable at least by virtue of its dependency from an allowable base claim.

New rejections

The Examiner rejected independent claims 1, 29, 33, 38 and 42 as being unpatentable over Schroeder in view of Fujita.

Schroeder and Fujita even in combination do not teach alternating layers of polymeric and non-polymeric materials

Independent claim 1 recites an insulation system for an oil filled environment that includes a plurality of insulating units, each comprising a *first layer of polymeric material* and a *second layer of non-polymeric material*. The insulating units are positioned with respect to each other such that the second layer of non-polymeric

material of one insulating unit is adjacent to the first layer of polymeric material of another insulating unit.

Independent claim 29 similarly recites an insulation system for an oil filled environment that includes a plurality of insulation units comprising a *polymeric layer and a non-polymeric layer*. The insulation units are stacked such that each non-polymeric layer is disposed between two polymeric layers of the insulation system. The insulation is selected from the group consisting of layer insulation, main insulation, spacer insulation, end rings and any combination thereof.

Independent claim 33 also recites an insulation system for an oil filled environment including a plurality of alternating layers of *polymeric and non-polymeric materials*.

Independent claim 38 also recites an insulation system for an oil filled environment that includes a plurality of insulating units, each comprising a first layer of polymeric material and a second layer of paper material. The insulating units are positioned with respect to each other such that the second layer of paper material of one insulating unit is adjacent to the first layer of polymeric material of another insulating unit.

Finally, independent claim 42 recites an insulation system for an oil filled environment that includes a plurality of insulation units comprising a polymeric layer and a paper layer, insulation units being stacked such that the paper layer is disposed between two polymeric layers. Here again, the insulation system includes an insulation selected from the group consisting of layer insulation, main insulation, spacer insulation, end rings and any combination thereof.

Applicants thus submit that independent claims 1, 29, 33, 38 and 42 recite, in generally similar language, the insulation system including alternating layers of a polymeric and a non-polymeric material. According to the Specification, the non-polymeric material might include such materials as cellulose paper, fish paper, ceramic paper, or combinations thereof.

The Examiner argued that Schroeder discloses a layered insulation system for an oil filled environment that includes a plurality of insulating units, each comprising first and second layers of insulating material. Further, the Examiner contended that at least one of the first and second layers is said to include a polymeric material, and that the insulating units are positioned with respect to each other such that the second layer of one insulating unit is adjacent to the first layer of another insulating unit. The polymeric material of Schroeder is polyethylene terephthalate. The Examiner admitted that Schroeder does not teach a first layer comprising a non-polymeric material and the second layer comprising a polymeric material. Further, the Examiner relied upon Fujita to teach intermediate non-polymeric layers.

Fujita discloses an insulation system comprising first and second layers, wherein the first layer comprises "insulating paper" and the second layer comprises polypropylene material. The Examiner argued that it would have been obvious to one having ordinary skill in the art at the time the invention was made to use the materials of the insulating system of Fujita in the Schroeder system for the purpose of enhancing strength.

Applicants respectfully submit that, in fact, Fujita does not disclose alternating layers of a polymeric and a *non-polymeric* material. Fujita actually discloses an "electrical insulating paper" including at least one layer (A) that is a *mixture of polypropylene fibers and kraft pulp* and at least one layer (B) of accumulated polypropylene fibers laminated to the layer (A) by fiber-to-fiber bonding of the polypropylene fibers. *See*, Fujita, Abstract. Clearly, Fujita does not disclose the layer (A)

to be non-polymeric as claimed in the present invention. Indeed, Fujita fails to describe a non-polymeric layer at all.

Applicants respectfully submit that even in combination Schroeder and Fujita do not teach alternating layers of polymeric and non-polymeric materials in an insulation system as claimed. Therefore, Applicants submit that independent claims 1, 29, 33, 38 and 42 and the claims depending therefrom are allowable and respectfully request the Examiner to reconsider the rejection of the claims.

Examiner's purported motivation to combine Schroeder and Fujita is baseless.

The Examiner suggested that it would have been obvious to one skilled in the art at the time the invention was made to use material of the insulating system of Fujita in the Schroeder system for the purpose of "enhancing strength" (apparently dielectric strength, although this is not mentioned by the Examiner). Applicants respectfully submit that the motivation to combine the references for the purpose of enhancing strength is nowhere found in either of the references. The present invention involves the use of alternating layers of polymeric and non-polymeric materials, which it has been found provides for use of less main insulation material while maintaining the same or greater dielectric breakdown strength than available via a larger thickness of paper insulation alone. There is simply no basis in the record for concluding that replacing layers of either prior art system with non-polymeric layers (not taught by either) would even increase the dielectric strength of the layered systems they teach.

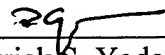
Therefore, Applicants submit that independent claims 1, 29, 33, 38 and 42 and the claims depending therefrom are allowable and respectfully request the Examiner to reconsider their rejection.

Conclusion

In view of the remarks and amendments set forth above, Applicants respectfully request allowance of the pending claims. If the Examiner believes that a telephonic interview will help speed this application toward issuance, the Examiner is invited to contact the undersigned at the telephone number listed below.

Respectfully submitted,

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